

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

BRENNAN M. GILMORE,)
v.)
Plaintiff,) Civil Action No. 3:18-cv-00017NKM-JCH
v.)
ALEXANDER E. (ALEX) JONES; *et al.*,)
Defendants.)

**JOINT MOTION FOR EXTENSION OF TIME
TO COMPLETE FACT DISCOVERY**

The undersigned parties, by and through counsel, respectfully move this Court for an extension of time to complete discovery. Moving parties request that this Court extend all deadlines, including the trial date, by ninety days so that the parties can complete discovery without prejudice to Plaintiff.

Absent an extension of the fact discovery deadline, Plaintiff is willing to hold depositions past the current deadline to accommodate counsel for Alex E. Jones, Infowars, LLC and Free Speech Systems, LLC (“Jones Defendants”), Marc J. Randazza, due to his scheduling limitations and childcare issues as a single father. Counsel for Plaintiff has been extremely accommodating in this situation, and counsel for Jones Defendants does not wish to prejudice their case by limiting their discovery in any way.

Plaintiff believes that additional time is needed to process and review discovery productions from Defendants Hoft and Creighton, which are still pending. Additionally, Plaintiff requests additional time to complete discovery into Defendant Jones’s text messages.

In addition, Defendant Lee Ann McAdoo’s counsel, who is a solo practitioner and only recently entered his appearance in this case, has a longstanding, previously scheduled family vacation in mid-August that along with taking his son back to college will make him unavailable

for depositions and other discovery for a period of 10 days later this month. Thus, Defendant McAdoo joins the other parties' extension request.

Given the short period of time between the current close of fact discovery and the trial date, the parties are of the view that an extension of all deadlines is necessary in order to not prejudice the parties.

Therefore, the parties agree that no party will be prejudiced by an extension of the deadlines in order to complete discovery, and all parties believe that this extension will be a positive factor in the administration of justice.

Dated: August 6, 2021.

Respectfully submitted,

/s/ Marc J. Randazza

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CERTIFICATE OF SERVICE

I hereby certify that, on this 6th day of August, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Marc J. Randazza
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